Ryan K. Biggs
HSE Manager

ConocoPhillips Company
Ferndale Refinery
3901 Unick Road – P.O. Box 8
Ferndale, WA 98248

ConocoPhillips

February 1, 2012
HSE 580.003, File No. 6.4.3.1.5.5

US Environmental Protection Agency
Ariel Rios Building
Mail Code 2254A
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460
Attn: International Compliance Assurance Division

Re: Hazardous Waste Primary Exporter Annual Report 2011

Dear International Compliance Assurance Division:

The following information is provided pursuant to the requirement of 40 CFR 262.56, 262.87(a).

1. **Exporter Information:**
   EPA Identification Number: WAD009250366
   Name: ConocoPhillips Company, Ferndale Refinery
   Mailing Address: P.O. Box 8, Ferndale, WA 98248
   Site Address: 3901 Unick Road, Ferndale, WA 98248

2. **Report Calendar Year:** 2011

3. **Name and Address of each Consignee:**

Consignee	AOC No.	Name	Address
PS13075(02)	001136/8E/10 003124/7E/11	Envirogreen Technologies Ltd.	LELA Lot 401, Similco Mine Site Princeton, BC, Canada V0X 1W0

received
Sun 2/15/2012

CERTIFIED MAIL™

ConocoPhillips Ferndale Refinery
P.O. Box 8
3901 Unick Road
Ferndale, WA 98248

7009 0820 0001 0663 9629

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ConocoPhillips

US Environmental Protection Agency
International Compliance Assurance Division
Ariel Rios Building
Mail Code 2254A
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

route EPA Mail

To: International Compliance

Mailstop: ARIEL RIOS NORTH

Department: 2254A

Phone:

PKG Condition Certified

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4. **Consignee and Waste Information:**

Consignee	Haz. Waste Description	EPA Waste Code	DOT Hazard Class	Transporter Name and EPA ID No.	No. of Shipments	Total Pounds
PS13075(02)	Waste Petroleum Refinery Oily Solids	F037	9	MP Environmental Services, Inc. CAT00624247	8	219,940
PS13075(02)	Crude Oil Storage Tank Sediments	K169	9	MP Environmental Services, Inc. CAT00624247	1	8,920

5. **Description of efforts to reduce volume and toxicity of waste generated and comparisons with previous years:**

Efforts to reduce the volume and toxicity of the F037 sludges consist of separating free liquids (oil and water) from the solids by means of plate and frame pressing. The solids are transported to a thermal desorption facility in British Columbia, Canada. The treated solids are utilized in a mine restoration project in British Columbia. The recovered oil is returned to the Ferndale refining process as feedstock and the separated water is sent to, and treated in, the refinery's Wastewater Treatment Plant (WWTP). Compared to annual volumes over the previous 5 years, the 2011 solids represent a continued reduction in the amount of waste generated from cleaning activity of the WWTP storage tanks and oil/water separators.

The amount of K169-listed waste generated in 2011 reflects the cleaning of a crude oil storage tank at the refinery; by comparison to previous years, solids were last generated in 2008. The volume of sediments removed from the tank was minimized by separating free liquids (oil and water) from the solids by means of plate and frame pressing. Recovered oil and the solids are managed as described in the paragraph above.

6. **Certification:**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

If you have questions about this report or require further information, please contact Tim Johnson at (360) 384-8368.

Sincerely yours,

Ryan K. Biggs

Ryan K Biggs

RKB:TDJ/kjm